

EXHIBIT I.2

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION
4
5 -----x
6 IN RE: NATIONAL PRESCRIPTION) Case No.
7 OPIATE LITIGATION) 1:17-MD-2804
8 APPLIES TO ALL CASES) Hon. Dan A. Polster
9 -----x

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VIDEOTAPED DEPOSITION OF GARY L. BOGGS

13

WASHINGTON, D.C.

14

THURSDAY, JANUARY 17, 2019

15

9:07 A.M.

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23 Pages: 1 - 429

24 Reported by: Leslie A. Todd

1 many orders McKesson gets of unusual size, pattern
2 or frequency in a given month?

3 MR. RAFFERTY: Objection.

4 THE WITNESS: Probably thousands.

5 BY MR. STANNER:

6 Q Mr. Boggs, I'll rephrase.

7 Mr. Boggs, do you know how many
8 suspicious orders McKesson reports to the DEA in a
9 typical month?

10 MR. RAFFERTY: Objection.

11 THE WITNESS: Thousands.

12 BY MR. STANNER:

13 Q So does that mean that the customers who
14 place those suspicious orders are suspicious
15 customers?

16 A Absolutely not.

17 Q If a customer places a suspicious order,
18 does that mean the order is probably for some
19 illegal purpose?

20 A Without knowing more about the customer
21 or more information, absolutely not.

22 Q If a customer places a suspicious order,
23 does that mean that order is likely to be
24 diverted?

1 would prioritize profits over following the law?

2 A I have not.

3 Q In your time at McKesson, have you ever
4 suggested terminating a customer and had the
5 company push back on that?

6 A I have not. They -- I have unilateral
7 authority to terminate a customer regardless of
8 any financial gain or loss to the company or
9 financial gain or loss to the -- to the customer.
10 And since I've been at McKesson, our program has
11 probably stopped shipping to 250-some-odd
12 customers.

13

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED]